

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

**\*\*FILED\*\***  
**30 JULY 2021**  
**U.S. EPA - REGION IX**

IN THE MATTER OF:	)	U. S. EPA Docket No.
	)	
	)	RCRA-09-2021-0061
	)	
Minaris Regenerative Medicine, LLC	)	EXPEDITED SETTLEMENT
EPA ID. No. CAL000431599	)	AGREEMENT AND
Respondent.	)	FINAL ORDER
	)	
	)	

**EXPEDITED SETTLEMENT AGREEMENT**

1. The U.S. Environmental Protection Agency (“EPA”) alleges that Minaris Regenerative Medicine, LLC (“Respondent”), owner or operator of the facility located at 291 N. Bernardo Avenue, Mountain View, CA 94043 (the “Facility”), failed to comply with the Biennial Reporting and EPA identification number requirements under the Resource Conservation and Recovery Act (“RCRA”) and the EPA approved and authorized California hazardous waste management program<sup>1</sup>.
2. Under 22 CCR § 66262.41 [40 Code of Federal Regulations (“CFR”) § 262.41], Respondent was required to submit a 2019 Biennial Report by March 1, 2020.
3. Under 22 CCR § 66262.12(a) [40 CFR § 262.18(a)], Respondent is required to obtain an EPA identification number to ship regulated quantities of RCRA hazardous waste.
4. EPA and Respondent agree that settlement of this matter for a penalty of Three Thousand Five Hundred Dollars (\$3,500) is in the public interest.
5. EPA is authorized to enter into this Expedited Settlement Agreement (“Agreement”) pursuant to Section 3008 of RCRA and 40 C.F.R. § 22.13(b).
6. In accordance with 40 C.F.R. § 22.18(b)(2) and for the purpose of this proceeding, Respondent: (i) admits that EPA has jurisdiction over the subject matter of this Agreement and over Respondent; (ii) neither admits nor denies the specific factual allegations contained in the Agreement; (iii) consents to any and all conditions specified in this Agreement and to the assessment of the civil administrative penalty specified in this Agreement; (iv) waives any right to contest the allegations contained in this Agreement; and (v) waives the right to appeal this Agreement as a final order.
7. By its signature below Respondent certifies, subject to civil and criminal penalties for

---

<sup>1</sup> All citations in this Agreement refer to the California Code of Regulations (“CCR”) refer to Division 4.5 of Title 22 of the current California Code of Regulations. EPA is enforcing California hazardous waste management program requirements as approved and authorized by the United States on August 1, 1992 (see 57 Fed. Reg. 32726, July 23, 1992), September 26, 2001 (66 Fed. Reg. 49118, September 26, 2001), October 7, 2011 (see 76 Fed. Reg. 62303, October 7, 2011) and January 14, 2020 (see 85 Fed. Reg. 2038, January 14, 2020). Corresponding Federal citations are provided as a convenience in brackets.

making a false submission to the United States Government, that: (1) the alleged violation has been corrected, and (2) Respondent is submitting proof of payment of the civil penalty with this Agreement. The civil penalty of Three Thousand Five Hundred Dollars (\$3,500) should be paid in accordance with EPA Region IX Penalty Collection Procedures provided to the Respondent.

8. Upon the effective date of this Agreement, payment of the civil penalty shall constitute full settlement of the civil claim alleged herein.
9. EPA reserves all of its rights to take enforcement action for any other past, present, or future violations by Respondent of RCRA, any other federal statute or regulation, or this Agreement.
10. Upon signing and returning this Agreement to EPA, Respondent waives the opportunity for a hearing or appeal pursuant to Section 3008(b) of RCRA.
11. Each party shall bear its own costs and fees, if any.
12. This Agreement is binding on the parties signing below, and in accordance with 40 CFR § 22.31(b), is effective upon filing.

IT IS SO AGREED,

Name (print): Jesús Angala

Title (print): Sr. Site Director

Signature: 

Date 07/08/2021

APPROVED BY EPA:

**AMY MILLER-  
BOWEN**

Digitally signed by AMY  
MILLER-BOWEN  
Date: 2021.07.15 15:28:37  
-07'00'

Date: \_\_\_\_\_

Amy C. Miller-Bowen, Director  
Enforcement and Compliance Assurance Division  
U.S. EPA Region IX

IT IS SO ORDERED:

**STEVEN JAWGIEL**

Digitally signed by STEVEN  
JAWGIEL

Date: 2021.07.30 12:44:00 -07'00'

Date: \_\_\_\_\_

Steven L. Jawgiel  
Regional Judicial Officer  
U.S. EPA Region IX

## CERTIFICATE OF SERVICE

This is to certify that the fully executed Expedited Settlement Agreement in the matter of Minaris Regeneration Medicine, LLC (RCRA-09-2021-0061) was filed with the Regional Hearing Clerk, U.S. EPA, Region 09, and that a true and correct copy of the same was sent to the following parties:

FOR RESPONDENT:

VIA E-MAIL

Stephen Humes  
Holland & Knight, LLP  
31 West 52<sup>nd</sup> Street  
New York, NY 10019  
Steve.Humes@hklaw.com

FOR COMPLAINANT:

VIA E-MAIL

Andrew Helmlinger  
Assistant Regional Counsel  
U. S. EPA – Region 9  
San Francisco, CA 94105  
Helmlinger.Andrew@epa.gov

Armsey , Digitally signed by  
Steven , Armsey, Steven  
Date: 2021.07.30  
18:36:52 -07'00'

---

Steven Armsey  
Regional Hearing Clerk  
U.S. EPA, Region IX

---

Date